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November 30, 1999

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W., Room TW-A325  
Washington, DC 20554

**RE: CC Docket No. 98-170, Petition for Waiver of November 12, 1999 Truth-In-Billing Date**

Dear Ms. Salas:

Enclosed is the Petition of Guam Telephone Authority, hereby requesting a temporary waiver until April 1, 2000 of the November 12, 1999 requirement to comply with the Truth-In-Billing rules.

An original and four copies are being filed. Please return the stamped copy in the SASE.

Sincerely,

Jeffrey H. Smith  
Consulting Manager

Attachment

Cc:  
Lawrence Strickling, Chief  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 5-C450  
Washington, D.C. 20554

Lisa Zaina, Acting Deputy Bureau Chief  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 5-B303  
Washington, D.C. 20554

Glenn T. Reynolds, Chief  
Enforcement Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 5-A847  
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David Konuch, Attorney  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 5-C313  
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International Transcription Services  
1231 20<sup>th</sup> Street, NW  
Washington, D.C. 20554

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of	)	
the Petition of Guam	)	
Telephone Authority Request for	)	CC Docket No. 98-170
Waiver of Truth-In-Billing	)	
And Billing Format Implementation	)	
Deadline	)	

PETITION OF GUAM TELEPHONE AUTHORITY  
FOR LIMITED WAIVER OF THE TRUTH-IN-BILLING  
IMPLEMENTATION DATE

Guam Telephone Authority  
642 N. Marine Drive  
P.O. Box 9008  
Tamuning, Guam 96931

Date Submitted: November 30, 1999

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of	)	
the Petition of Guam	)	
Telephone Authority Request for	)	CC Docket No. 98-170
Waiver of Truth-In-Billing	)	
And Billing Format Implementation	)	
Deadline	)	

PETITION OF GUAM TELEPHONE AUTHORITY  
FOR LIMITED WAIVER OF THE TRUTH-IN-BILLING AND BILLING FORMAT  
IMPLEMENTATION DATE

Guam Telephone Authority (hereinafter GTA), by its consultant, hereby requests a temporary waiver of certain portions of section 64.2401 of the Commission's "truth-in-billing" (TIB) rules, which took effect on November 12, 1999.<sup>1</sup> GTA seeks this temporary waiver of the Truth-In-Billing requirements effective November 12, 1999, until April 1, 2000. GTA recognizes that a pending Petition by the United States Telephone Association ("USTA") seeks similar relief for USTA member companies, of which GTA is a member. In addition, it is understood that a pending Joint Petition filed by the National Exchange Carrier Association, Inc., the National Telephone Cooperative Association, and the Organization for the Promotion and Advancement of Small Telecommunications Companies, (collectively the "Associations") also seek similar relief for their member companies. Accordingly, since relief has not been granted, as of the date of this filing, GTA requests a waiver of the TIB requirements until April 1, 2000.

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<sup>1</sup> See In the Matter of Truth-In-Billing and Billing Format, CC Docket 98-170, First Report and Order and Further Notice of Proposed Rulemaking; FCC 99-72, rel. May 11, 1999, 64 Fed. Reg. 34488 (1999); Errata CC Docket 98-170, DA 99-2092, (rel. Oct. 6, 1999), 64 Fed. Reg. 56177 (1999).

This date corresponds to the date the Commission previously established for implementing certain other TIB requirements.<sup>2</sup>

### **Background**

GTA provides exchange services to approximately 77, 500 access lines in Guam. GTA is in the process of building its own billing system, integrating the IBM ICMS system for end user billing, and the J. D. Edwards IFMS system for carrier access billing. The programming of the new system started at the beginning of the year, prior to the TIB rules being implemented. Completion of the new system is scheduled at the end of November, pending no problems with programming efforts and Y2K compliance efforts.

The implementation of the new system has been a major undertaking by GTA. Implementation of the new system has been compounded by Y2K compliance efforts. GTA believes that it will be compliant with some of the TIB rules. However, it has not completed its investigation as to what additional programming will be needed to ensure compliance with all of the rules. Rather than reallocate programming resources to completing the tasks implementing TIB requirements, the best interest of the public would be served by completing the initial implementation of the billing system and ensuring Y2K compliance. This effort will minimize the impact of reprogramming the system to accommodate TIB requirements at this time and not cause delays.

### **Conclusion**

Accordingly, GTA respectfully requests the Commission to waive the TIB requirements of section 64.2401, effective November 12, 1999, until April 1, 2000. GTA is working diligently

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<sup>2</sup> See 64 Fed. Reg. 55163 (Oct. 12, 1999); *see also* Public Notice, DA 99-2030 (Sept. 30, 1999) and Public Notice, DA 99-1789 (Sept. 2, 1999).

GTA Petition for Extension  
November 30, 1999

to implement their new billing system, at the same time ensure Y2K compliance. GTA recognizes the importance of the TIB requirements. The requested waiver will allow limited additional time for GTA to meet the requirements. Customers will not be harmed by grant of this waiver. GTA will continue to provide the appropriate information necessary to address customers billing inquiries and will work aggressively towards full implementation of the TIB requirements by April 1, 2000.

By Jeffrey H. Smith  
Jeffrey H. Smith  
Consulting Manager  
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